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September 5, 2023

**VIA ECF**

Honorable Joan M. Azrack  
United States District Judge  
United States District Court  
Eastern District of New York  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, New York 11722

Re: *Robert Goldblatt v. New York Institute of Technology,*  
2:18-cv-00265 (JMA)(LGD)

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Dear Judge Azrack:

This firm represents Defendant New York Institute of Technology (“NYIT”) in the above-referenced action. I write to respectfully request a one-week extension of NYIT’s deadline to serve its motion for summary judgment from September 8, 2023 until September 15, 2023. I conferred with counsel for Plaintiff who consents to the following proposed briefing schedule:

NYIT’s deadline to serve its motion for summary judgment:	September 15, 2023
Plaintiff’s deadline to serve his opposition to NYIT’s motion:	November 3, 2023
NYIT’s deadline to serve its reply and file all motion papers:	December 1, 2023

Thank you for Your Honor’s consideration of NYIT’s first request for an extension.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP  
*Attorneys for Defendant*

By: Stefanie Toren

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Stefanie R. Toren

cc: Gregory Tsonis, Esq.